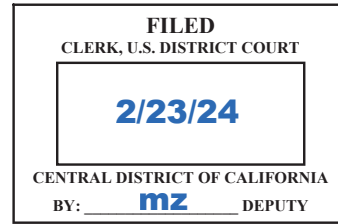


Ashley Richardson
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Ashrichardson@mac.com



IN PRO PER

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,

Plaintiff,

vs.

ASHLEY RICHARDSON,

Counter Claimant

Case No.: 2:23-cv-04669-MEMF-MAR

**REPLY TO OPPOSITION OF MOTION TO
DISMISS**

REPLY TO OPPOSITION OF MOTION TO DISMISS

1. I, the defendant Ashley Richardson, am replying in an abundance of caution to Taylor Thomson's Reply Memorandum filed with the court on February 09, 2024.
2. I believe my original counterclaim was filed in a timely manner, furthermore I can confirm that an extension was granted by McDermott, Will, and Emery and was filed on the agreed upon date. I believe that the opposing council is now taking liberties with the understanding that I do not have representation and looking for loopholes to discredit my counterclaim.
3. I currently do not have the funds to hire an attorney to represent me in this case, but I am doing the best that I can to respond in a timely manner with as much legal guidance as I can gain through the use of the internet and the very limited and occasional advice of attorneys that have represented me but that I am unable to retain for this matter.
4. Ms Thomson's legal team reached out to me when they learned that I was proceeding pro se and said they believed they could work something out, requesting a meeting by phone. It is an understatement to say that having a major law firm representing one of the richest women in the world is daunting, and I was very afraid to take this call myself. Because of this I asked Mr Gravante to please take the call on my behalf. During this call and via email Mr Gravante made it very clear he would not be representing me in this case and informed Ms Thomson's council that I was proceeding pro se. During this discussion Ms Thomsons' council agreed to a filing extension of December 22.
5. It is my understanding is that on the same call with Mr Gravante Ms Thomson's legal teams stated that they understood that due to my extremely dire financial condition they would be willing to dismiss me from this case if I helped to corroborate Ms Thomsons testimony. Because I maintain that the accusations made by Ms Thomson are untrue, I declined this offer as corroborating Ms Thomsons's testimony would require me to purjure myself.

REPLY TO OPPOSITION OF MOTION TO DISMISS - 1

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- 2 6. While I am not familiar with the legal language required, I can attest that everything I have filed both in my
- 3 responses and in my counterclaims is true, and to the best of my understanding. As far as I know Ms
- 4 Thomson's attorneys believe the testimony of their client and I do not see how in defending my own
- 5 experience and truth, especially as a pro se party that is not a lawyer, that any of this could be sanctionable.
- 6 However, I am aware that there are intricacies of the legal system to which I am unaware and if I have
- 7 made an error I would ask the court for an opportunity to amend anything that may be perceived as
- 8 improper.
- 9
- 10 7. Once again, contrary to the assertion of opposing council, I believe that that I have adequately pled both of
- 11 my counterclaims, but if the court disagrees, I can, and will add allegations and if required proof to the
- 12 amended counterclaims.
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DATE: Feb 23, 2024

ASHLEY RICHARDSON – IN PRO PER

A handwritten signature in black ink, appearing to read 'AR', followed by a horizontal line extending to the right.

By:

ASHLEY RICHARDSON

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